

## REMARKS

This Amendment is fully responsive to the Office Action dated October 24, 2008, issued in connection with the above-identified application. A petition for a one-month extension of time accompanies this Amendment. Claims 29-56 were previously pending in the present application. With this Amendment, claims 29, 50, 51, 54 and 55 have been amended; and claim 31 has been canceled without prejudice or disclaimer to the subject matter therein. Accordingly, claims 29, 30 and 32-56 are now pending in the present application. No new matter has been introduced by the amendments made to the claims. Favorable reconsideration is respectfully requested.

At the outset, the Applicants thank Examiner Saint Cyr and his Supervisor for granting the telephone interview (hereafter "interview") conducted with the Applicants' representative on February 17, 2009. During the interview, the distinguishable features between the present invention and the cited prior art were discussed in more detail. Additionally, the possibility of incorporating the features of dependent claim 31 into the independent claims; and the applied Guenebaud reference were also discussed.

It was noted that Guenebaud fails to disclose or suggest all the features of the control device and plurality of buffers of the present invention. Additionally, although the Examiner indicated that the Guenebaud reference discloses or suggests a plurality of buffers (i.e., storing means 10), the Examiner was unable to point out where the reference disclosed or suggested "a control device that controls an ON/OFF state of respective buffers in an interface device so as to control the input/output processing of the interface device."

At the conclusion of the interview, the Examiner indicated that further consideration would be given to the present application if the independent claims were amended to include the features of dependent claim 31 given that it was not immediately apparent that such features were disclosed or suggested by the cited prior art.

In the Office Action, claims 29-37, 39-41 and 43-55 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Guenebaud (U.S. Publication No. 2003/0012377, hereinafter "Guenebaud") in view of Colman et al. (U.S. Publication No. 2002/0124193, hereinafter "Colman"). The Applicants have amended independent claims 29, 50, 51, 54 and 55 to help

further distinguish the present invention from the cited prior art. Specifically, independent claims 29, 50, 51, 54 and 55 have been amended to be consistent with the amendments discussed during the interview conducted on February 17, 2009 (i.e., to include the features of dependent claim 31). For example, as amended, claim 29 recites the following features:

“[a] digital television receiver module for use in a digital television receiver for receiving a digital television signal, comprising:

    a first connecting device having a plurality of terminals for electrically connecting to one external substrate among external substrates which can receive digital television signals of broadcasting systems different from each other;

    a decoding device for executing a decoding processing on a digital television signal inputted from a demodulator provided on said external substrate via said first connecting device, so as to convert the digital television signal into a video signal and an audio signal, and for outputting the video signal and audio signal via said first connecting device;

    a control device for controlling an operation of said digital television receiver module; and

    an interface device which is connected to one conditional access module among a plurality of types of conditional access modules having electrical specifications different from each other via said first connecting device, and which is connected to said demodulator, said decoding device, and said control device, said interface device executing input and output processings on a plurality of signals communicated among said demodulator, said conditional access module, said decoding device, and said control device,

    wherein said control device controls said interface device by changing types and electrical specifications of at least one signal of a plurality of signals communicated via said first connecting device, so as to conform to electrical specifications of a connected conditional access module, in response to at least one of a broadcasting system of an inputted digital television signal and a type of said connected conditional access module; and said interface device comprises a plurality of buffers, and said control device controls on-off states of respective buffers in said interface device so as to control the input and output processings.” (Emphasis added).

The features emphasized above in independent claim 29 are similarly recited in independent claims 50, 51, 54 and 55 (as amended). Additionally, the features emphasized above were previously recited in dependent claim 31 (now canceled). Accordingly, the features emphasized above are fully supported by the Applicants' disclosure.

The present invention, as recited in independent claim 29, 50, 51, 54 and 55, is directed to providing a module for use with a digital television (DTV) for connecting decoders of devices common to respective countries that possess front-end circuits and conditional access (CA) modules that are different (i.e., made different for the respective countries). Additionally, the module of the present invention includes a simple structure that can be made at a low cost.

In particular, the present invention is directed to a digital television receiver module for use in a digital receiver that comprises, in part, an interface device and a control device. The interface device includes a plurality of buffers, and the control device controls the on/off states of the respective buffers so as to control the input and output processing performed by the interface device. No such features or advantages are believed to be disclosed or suggested by the cited prior art.

In the Office Action, the Examiner relies on a combination of Guenebaud and Colman for disclosing or suggesting all the features recited in independent claims 29, 50, 51, 54 and 55. However, the Examiner relies primarily on Guenebaud for disclosing or suggesting the claimed interface and control devices.

In particular, the Examiner alleges that the interface module disclosed in Guenebaud comprises a means 10 for storing a plurality of conditional access (CA) systems 11, which is equivalent to the claimed plurality of buffers of the present invention (see e.g., ¶ [0055]).

However, the Applicants assert that Guenebaud clearly fails to disclose or suggest a control device that controls the on/off states of the respective buffers (of the plurality of buffers) so as to control the input and output processing performed by the interface device.

In fact, the Applicants respectfully point out that ¶ [0083] to ¶ [0084] of Guenebaud describe that if a CA system 11 is to be added or updated, such operations are performed by downloading software from a server center available to the digital television operator. Thus, in order to control the plurality of CA systems, it is necessary for the means 10 disclosed in

Guenebaud to download software for each CA system.

Accordingly, Guenebaud does not disclose or suggest an interface device that comprises a plurality of buffers, wherein a control device controls the on/off state of the respective buffers so as to control the input and output processing of the interface device. Thus, the interface module disclosed in Guenebaud cannot provide the same features or advantages as the present invention (as recited in independent claim 29, 50, 51, 54 and 55).

As noted above Coleman was not relied on for disclosing or suggesting the above features of the present invention. Regardless, after a detailed review of Coleman, the reference fails to overcome the deficiencies noted above in Guenebaud. Accordingly, no combination of Guenebaud and Coleman would result in, or otherwise render obvious, claims 29, 50, 51, 54 and 55 (as amended). Likewise, no combination of Guenebaud and Coleman would result in, or otherwise render obvious, claims 28, 30, 32-37, 39-41 and 43-49, 52 and 53 at least by virtue of their respective dependencies from independent claims 29 and 50.

In the Office Action, claim 38 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Guenebaud in view of Colman, and further in view of Candelore et al. (U.S. Publication No. 2004/0228175, hereinafter "Candelore"); claim 42 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Guenebaud in view of Colman, and further in view of Jensen et al. (U.S. Patent No. 6,603,080, hereinafter "Jensen"); and claim 56 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Guenebaud in view of Colman, and further in view of Sengupta et al. (U.S. Publication No. 2005/0088255, hereinafter "Sengupta").

Claims 38 and 42 depend from independent claim 29; and claim 56 depends from independent claim 50. As noted above, Guenebaud and Colman fail to disclose or suggest all the features recited in independent claims 29 and 50. Additionally, Candelore, Jensen and Sengupta fail to overcome the deficiencies noted above in Guenebaud and Coleman. Accordingly, no combination of Guenebaud, Colman, Candelore, Jensen and Sengupta would result in, or otherwise render obvious, claims 38, 42 and 56 at least by virtue of their respective dependencies from independent claims 29 and 50.

In light of the above, the Applicants respectfully submit that all the pending claims are patentable over the prior art of record. The Applicants respectfully request that the Examiner

withdraw the rejections presented in the outstanding Office Action, and pass this application issue. The Examiner is invited to contact the undersigned attorney by telephone to resolve any remaining issues.

Respectfully submitted,

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